

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA
Plaintiff**

v.

**Civil Action No.
04-12582-RCL**

**301 ADAMS STREET, QUINCY,
MASSACHUSETTS; 1548-1558
DORCHESTER AVENUE, DORCHESTER,
MASSACHUSETTS; FIVE (5) CERTAIN
PARCELS OF LAND WITH THE BUILDING(S)
THEREON IN BROCKTON PLYMOUTH COUNTY,
MASSACHUSETTS, COMMONLY KNOWN AS
11 ROSSETER STREET, 16 ROSSETER, 213-223
NORTH MAIN STREET, 204 NORTH MONTELLO
STREET, INCLUDING ALL APPURTENANCES AND
IMPROVEMENTS THERON; \$67,561.88 IN UNITED
STATES CURRENCY; AND \$26,776.42 IN UNITED
STATES CURRENCY, SEIZED FROM ASIAN AMERICAN)
BANK CHECKING ACCOUNT NUMBER 310029269)
Defendants**

**MOTION TO INTERVENE PURSUANT TO RULE 24 OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

Tina Le seeks to intervene as a party Defendant in the above entitled matter,
pursuant to Rule 24 (a) and/or (b) of the Federal Rules of Civil Procedure.

In support of this Motion, Tina Le states the following:

1. Tina Le may intervene as a right pursuant to Rule 24 (a)(2) of the Federal
Rules of Civil Procedure. On or about December 15, 2004 and July 12, 2005,

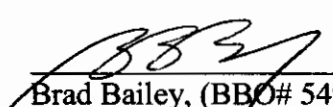
real property, buildings and monies were seized from various locations in Brockton, Quincy and Dorchester “which are the subject of the Action and she is so situated that the disposition of the Action may as a practical matter impair and impede her ability to protect that interest...”;

2. In addition, Tina Le may intervene pursuant to Rule 24 (b)(2) of the Federal Rules of Civil Procedure. All questions of law that in fact might be raised on behalf of the Defendant in this proceeding are identical to those to be raised by Tina Le; and
3. This Motion is timely filed and an intervention will not unduly delay or prejudice the adjudication of the rights of the original parties.

For the foregoing reasons, Tina Le prays this Honorable Court allow her to intervene as either a matter of right or in the discretion of the Court.

Dated: October 24, 2005

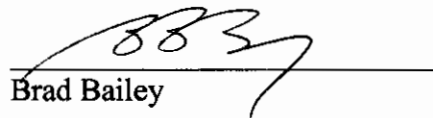
Respectfully submitted
TINA LE,
By her attorney



Brad Bailey, (BBO# 549749)
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CERTIFICATE OF SERVICE

I, Brad Bailey, Counsel for Defendant, hereby certify that on the 24th of October, 2005 the within Motion to Intervene Pursuant to Rule 24 was mailed by first class mail, postage prepaid to Assistant United States District Attorney Jonathan Mitchell at the United States District Court, One Courthouse Way, Boston, MA 02210.


Brad Bailey